IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

C.H. as the parent of R.H., a minor child,

Plaintiff,

vs. Cause No. 1:11-cv-00271-JB-LAM

LOS LUNAS SCHOOLS BOARD OF EDUCATION, BERNARD SAIZ, MARIO ZUNIGA, KELLY LEE and RANCE HALL, GERALD SANCHEZ, MICHAEL CARROLL, JAMES ROMERO,

Defendants.

NOTICE OF FILING OF EXHIBIT IN ERRATA

The Plaintiff, by and through her counsel of record, Bregman & Loman, P.C. (Eric Loman) respectfully submits the attached exhibit, which was intended to be attached to, but was inadvertently omitted from, Plaintiff's Response To Defendant's Motion For Summary Judgment As To Plaintiff's Title IX Claim (Doc. 67). Plaintiff respectfully submits the attached document as part of Exhibit 3 of that brief.

Respectfully submitted:

BREGMAN & LOMAN, P.C.

By:____________________

Eric Loman
CAID # 03/231
Attorney for Plaintiff
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Albuquerque, NM 87102
(505) 761-5700

I certify that the foregoing was filed via the Court's CM/ECF system on July 13, 2012, which causes all counsel of record to be served by email.

____
Eric Loman

Hernandez v. Los Lunas, et al.
Defendants' Rule 26 Disclosures
000272

Bernard R. Saiz
Superintendent

Dana Sanders
Assistant Superintendent for Staff
and Student Services

Wilson Holland
Director of Athletics

LOS LUNAS SCHOOLS
EVERY STUDENT, EVERY YEAR: AT OR ABOVE GRADE LEVEL

RECEIVED
FEB 24 2011
PERSONNEL DEPT/LLS

Date: February 17, 2011

To: Kelley Lee

From: Wilson Holland, Director of Athletics

Re: Letter of Reprimand

CC: Personnel File, Colin Taylor, Principal

During a recent investigation into an alleged hazing incident you violated LLPS Board Policy 5.6.2-1 (refrain from disclosing confidential student records or information about a student or his/her personal and family) by disclosing confidential information concerning a student to outside parties. You were directed not to discuss the particulars of the investigation with anyone. Your disregard for this directive is a violation of LLPS Board Policy 5.6.2-21 (In general, all school employees shall: respond in a prompt, direct, and professional manner to lawful directives, instructions, and requests from supervisors or administrators.)

You admitted discussing the investigation with your coaching staff. Certain members of your coaching staff are parents of potential suspects. This disclosure hindered and jeopardized the integrity of the district's investigation and subsequently jeopardized a student's safety. Your disclosure of the student's identity has resulted in the student dis-enrolling from VHS. The student's anonymity should have been preserved. It is the obligation of all adults involved with the lives of students to protect them from retaliation or any other safety concern. Because of your lack of judgment this student suffered retaliation.

In the future you are directed to maintain student confidentiality and refrain from the temptation to air your frustrations about parents or students with other staff. This is inclusive of but not limited to employees of the Los Lunas Schools, coaching staff, volunteers and parents. You may at any time discuss your concerns or frustrations with anyone in the athletic department as well as your immediate building level administrators. Any further disregard and or violation of LLPS Board Policy and or a directive given by your supervisor may result in further disciplinary action including termination. Thank you for your time and immediate attention to this matter.

I have received a copy of this letter of reprimand.

K Lee
Signature

2-17-11
Date

RECEIVED
FEB 25 2011

Lee
EXHIBIT NO. 8
3-12-12
J. K. SIMS, CCR #12

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